

Count copy

United States district Court  
District 1 boston ma.

case # CA No 0311422MLW

addendum Motion

Miscellaneous ,&

Steven Roland Drury  
plaintiff

) Motion to remend  
) jurisdiction by  
) State ,augment  
) and other matters

Vs

The New England Regional Council of Carpenters ,  
Carpenters local 107 ,Tomas Harrington ,  
Art Sisko , Simon James , and  
Kennedy and Rossi , Ing / owner  
Defendants

**Now Comes plaintiff Steven R Drury “ in propria persona , and in forma pauperis to state the following**

**“ Plaintiffs memorandum to support his motion to allow state jurisdiction , over his person and subject matter and to deny defendants removal to federal court and to address the injunction and summons matters Cancel by the removal acts by the defendants lawyers and allowed by the court , to re-schedule the injunction hearing at the cost of the defendant due to The defendant s defense maneuvering having cause all summons to be vacated costing court time and procedure interruptions to the plaintiff who has objected Plaintiff ask the court to rule on Conflict of interest of defendants lawyers krakow & Souris lcc , and the injunction , and venue , jurisdictional matters “ and misnomer respectfully**

**ARGUMENT**  
**misnomer**

1 The defendants have referral to the plaintiff as a STEVEN R DRURY in all paper work file with this court This is a misnomer Iam a human being not a fiction person or corporation and my name is NOT spell in all caps

therefor the paperwork file is not correct and in error , plaintiff demands the court to address the issue in a appropriate manner

2 The jurisdiction over the plaintiff person is in question The plaintiff does not wave his jurisdictional rights and admits none to the federal court by natural nature of being in his in propria persona , see **pennoyer Vs Neff , 95 U.s. 714.24 l.ed.565** and refuses to join issue under federal law when state jurisdiction can and could hear such subject matters within its jurisdiction The so called federal questions are answer by existing regulation The plaintiff has first hand knowledge that all acts, punishment's cause by the defendants where within the state of Massachusetts and under its jurisdiction The plaintiff works under a contract agreement dated 10 /1/2001/ though 08/31/05 Carpenters ( plaintiff a member in union ) and includes ONLY with agency of and within the state jurisdiction (see contract ) working outside the contract however would be under other jurisdiction of other contracts not sign under other locals the plaintiffs sense the acts and punishments where upon land under the venue and jurisdiction and long arm statue of Massachusetts MGL Not the federal government . The plaintiff demands the court remend that case back to the state court jurisdiction and or provide to the plaintiff the courts jurisdictional command over the subject matter and give time to plaintiff to answer the court if it choose to take jurisdiction it must show the plaintiff that he could not get a remedy and provide that the state would be deem without authority to adjudicate the matters over his person see **Court of appeals of missouri, easten district, writ division 2 952 s.w. 2d 324: 1997 mo. app lexis 1582 /**

**3 , further under FCJPR 1501 . PENSION (remedy )**  
THE FEDERAL UNITED STATES COURTS do not have jurisdiction over t the plaintiff losses of pensions .the plaintiff would not received a remedy under the federal court jurisdiction for his losses of pensions /retirement or payment of earning to wit . in light of this the jurisdiction should be remend back to the state court where by plaintiff has remedy within the contract agreements which is under its jurisdiction of the state of Massachusetts

4 The NERCC Contract was created by defendants lawyers in the state jurisdiction and its subject matter jurisdiction doesn't fall with the meaning or authority of the federal court damages would fall under losses in earning protenal and pension benefits

### **Conflict of interest**

#### **The plaintiff prays for relief in matter of conflict of interest**

1 The lawyer firm Krakow & Souris LLC is in conflict of interest with the plaintiff due to the following reasons

1 The plaintiff at a later time plans and will call this firm as a witness to interrupt contract agreement with the NERCC to wit : wording and meaning therefor a conflict of interest is created calling the firm as a witness

2 The plaintiff pays dues to union, as member of the union plaintiff may pay fees to wit working dues and dues to union who pays this firm in the interest of the member form money collected by union members therefor a conflict is created plaintiff may be paying for defendants lawyers

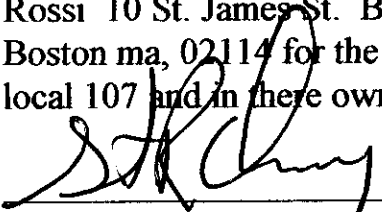
3 The defendants lawyers Krakow & Souris have created the Contract agreement with the union ( Drury included as member in union ) and under the signatory contractors agreement , Contract was created within the state of Massachusetts under such laws thereby the plaintiff plans to call as witness to have Krakow & Souris interpret union contract as expert witness The plaintiff shall call as a witness the Firm "Krakow & Souris .llc" . and all its lawyers / members of the firm to answer question and discovery in this case such shall be a conflict of interest to the defendants and to the plaintiff Drury prays and asks the court to dismiss the lawyers and in doing so must dismiss all there acts and filings within this court as this would become a conflict at later date in time/ or at present in this proceeding Drury considers this a notice to the court respectfully of his intentions and without the courts dismissal the plaintiff would endure a disadvantage in his case in law

### **Injunction**

4 The defendants lawyers firm or agent Christopher ,N Souris did file a removal “notice see court record and date” to the federal court and state court at the time he provided no sign affidavit that all defendants where in agreement which is a requirement under 1441 FCJPR the very document ON FILE would suggest that Kennedy and Rossi had their own lawyers and under rule 11 all must sign all documents , the removal was not sign by Kennedy and Rossi lawyers who to wit are not even listed and are not representing under the name in the documents file “ notice of removal” and as the documents maybe in agreement rule 11 would require all defendant parties to sign and or file a appearance by filing for the defendants as Mr Souris did and then after having other lawyers enter not listed on the document the plaintiff would feel that no agreement was legally enter under 1441 / fact is Kennedy and Rossi lawyer did not sign the removal notice there for voiding it and forever baring it due to time limits also and rule 11 requirement , It would suggest that Kennedy and Rossi always had there own representation which maybe now different then firm title on the notice of removal ( this cause the plaintiff time due to address conflicts ) and the union lawyers Mr Souris esq , file on behalf of all defendants the plaintiff disagrees with this agreement with Kennedy and Rossi & Souris and feels , Mr Souris may have acted in filing the notice of removal a document with the court only to stop the notice and summons sent to the defendants for a injection hearing on dated said forth upon the summons in lue of this The plaintiff ask the court to disregard the removal notice and remend the case to state court jurisdiction and resume the hearing procedure for the injunction subject matter The plaintiff ask that he be reinbust or to allow the court to charge the defendants lawyers for service for another hearing so as to recover the expense of the summons and cost and time to the plaintiff and to pay for the time of the plaintiff if the court finds error by the defendants , The plaintiff prays for this remedy and who represent the defendants personally ? is my question to the court (see complaint )

proof of service

I Steven R Drury hereby certify that I cause a copy of the foregoing documents to be sent on 08/22/03 to the following by fax and by letter united States district in Boston ,Holland & knight att for Kennedy and Rossi 10 St. James St. Boston , ma and krakow & Souris, llc 225 friend St. Boston ma, 02114 for the union and art sisco Simon James , tom Harrington local 107 and in there own by us mail Crete BY US MAIL

  
\_\_\_\_\_  
Steven R Drury  
18 Drury lane  
Templeton , Ma 01468

*cant copy*  
